



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

May 16, 2013

REPLY TO THE ATTENTION OF:

Mr. Tom Harmening
City Manager
City of St. Louis Park
5065 Minnetonka Boulevard
St. Louis Park, MN 55416

Mr. John Jones
Director of Regulatory Management
Vertellus Specialties, Inc.
201 North Illinois Street, Suite 1800
Indianapolis, IN 46204

RE: 2012 Progress Report on the Implementation of the Consent Decree
Reilly Tar & Chemical Superfund Site, St. Louis Park, Minnesota

Dear Mr. Harmening and Mr. Jones:

The Minnesota Pollution Control Agency (MPCA) and the U. S. Environmental Protection Agency (EPA) received the "2012 Annual Progress Report on the Implementation of the Consent Decree" submitted on March 15, 2013 from Summit Envirosolutions on behalf of the City of St. Louis Park (City). Staff reviewed the report and have the following comments.

Section 4 first paragraph and fourth paragraph of page 4-3.

The Prairie du Chien gradient control system is an ongoing issue in terms of assessing its effectiveness. We note that well W48 has not operated since the early 1990s, or been replaced. Section 7.4.2 of the CD-RAP addresses W48 and modifications to the Prairie du Chien gradient control system. The agencies are currently evaluating the status of this issue and the system.

Section 4.4 referencing Section 5 of the CD-RAP.

The report states: "Section 5.1 of the CD-RAP requires Reilly to monitor the City's active Mt. Simon-Hinckley Aquifer wells on an annual basis." The CD-RAP at Section 5.1 says, "...Reilly shall monitor SLP 11, 12, 13 and 17, and these wells shall be monitored annually thereafter." This language in the CD-RAP directs Reilly to monitor the wells whether they are active or not. We note that the City indicated that SLP17 cannot be sampled because it is off.

Section 4.8 referencing CD-RAP Section 9, second paragraph.

This section states that the average pumping rate for W421 was 15 gpm for 2012. Section 9.1.3 of the CD-RAP requires that gradient control wells operate at a monthly average rate of 25 gpm. The pump for well W421 was turned off from April to July for repairs. However, the average pumping rate for August to December was 20.6 gpm, which is below the rate specified by the CD-RAP. Please provide an explanation.

We note that the 2011 Annual Progress Report was not revised according to the Agencies' comments (Letter, October 24, 2012).

The 2012 Annual Progress Report is approved pending the explanation of the lowered pumping rates noted for pumping well W421. Corrections to the report language cited for Section 4.4 shall be modified in future reports. If you have any questions in this matter feel free to call Nile Fellows at (651) 757-2352 or Michelle Kerr at (312) 886-8961.

Sincerely,



Nile Fellows, Project Leader
Superfund Unit 1
Superfund and Emergency Response Section
Remediation Division
Minnesota Pollution Control Agency



Michelle Kerr
Remedial Project Manager
Superfund Division
U.S. Environmental Protection Agency

cc via e-mail: Mike Rardin, City of St. Louis Park
Scott Anderson, City of St. Louis Park
Bill Gregg, Summit
Dave Scheer, MPCA